

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

ANTOINE MANSON,

Plaintiff

v.

**B&S TRUCKING OF JACKSON, LLC;
JJ&C EXPRESS CORP; and
MARIEL ARIAS-PADILLA,**

Defendants

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CIVIL NO. 5:21-CV-1181-XR

PLAINTIFF'S FOURTH SUPPLEMENTAL TRIAL EXHIBIT LIST

Now Comes Plaintiff Antoine Manson, and hereby files this his Fourth Supplemental Exhibit List. Plaintiff reserves the right to amend his list to include exhibits that they could not have reasonably anticipated to be necessary.

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-1	Damage Summary - 2023.06.08 (Manson 001514)			
P-2	Methodist Hospital-Billing (Manson 000001-000004)			
P-3	Lotus Spine & Pain-Billing (Manson 001378-001381)			
P-4	Alamo City Pharmacy-Billing (Manson 000693-000694)			
P-5	American Health Imaging-Billing (Manson 000700-000703)			
P-6	Results Physiotherapy-Billing (Manson 000722-000723)			
P-7	Stephen E Earle MD PA-Billing (Manson 000188-000189)			
P-8	Dr. Dennis R. Gutzman- Billing (Manson 000545-000546)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-9	Methodist Hospital-Medical (Manson 000005-000039)			
P-10	Lotus Spine & Pain-Medical (Manson 001382-001503)			
P-11	Alamo City Pharmacy-Medical (Manson 000695-000699)			
P-12	American Health Imaging- Medical (Manson 000704-000719)			
P-13	Results Physiotherapy-Medical (Manson 000724-000762)			
P-14	Stephen E Earle MD PA-Medical (Manson 000190-000214)			
P-15	Dr. Dennis R. Gutzman- Medical (Manson 000547-000565)			
P-16	Methodist Hospital-Radiology (Manson 000040-000041)			
P-17	American Health Imaging-Radiology (Manson 000720-000721)			
P-18	Stephen E Earle MD PA-Radiology (Manson 000215-000221)			
P-19	ESI - Graphic.png (Manson 001377)			
P-20	Plaintiff's PD Photos (Manson 000225-000231)			
P-21	Certified Texas Peace Officer's Crash Report (Manson 000222-000224)			
P-22	Pennsylvania Department of Transportation-Arias, Padilla (Manson 000569-000573)			
P-23	Defendants' Driver Logs – Obtained from Motive f/k/a Keep Trucking (Manson 001515-001537)			
P-24	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 1 (Manson 000415)			
P-25	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 2 (Manson 000416)			
P-26	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 3 (Manson 000417)			
P-27	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 4 (Manson 000418)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-28	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 5 (Manson 000419)			
P-29	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 6 (Manson 000420)			
P-30	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 7 (Manson 000421)			
P-31	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 8 (Manson 000422)			
P-32	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 9 (Manson 000423)			
P-33	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 10 (Manson 000424)			
P-34	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 11 (Manson 000425)			
P-35	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 12 (Manson 000426)			
P-36	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 13 (Manson 000427)			
P-37	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 14 (Manson 000428)			
P-38	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 15 (Manson 000429)			
P-39	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 16 (Manson 000430)			
P-40	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 17 (Manson 000431)			
P-41	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 18 (Manson 000432)			

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P-42	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 19 (Manson 000433)			
P-43	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 20 (Manson 000434)			
P-44	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 21 (Manson 000435)			
P-45	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 22 (Manson 000436)			
P-46	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 23 (Manson 000437)			
P-47	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 24 (Manson 000438)			
P-48	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 25 (Manson 000439)			
P-49	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 26 (Manson 000440)			
P-50	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 27 (Manson 000441)			
P-51	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 28 (Manson 000442)			
P-52	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 29 (Manson 000443)			
P-53	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 30 (Manson 000444)			
P-54	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 31 (Manson 000445)			
P-55	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 32 (Manson 000446)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-56	J. Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 33 (Manson 000447)			
P-57	Eftekhari & Associates- JEA Gill Accident Reconstructionist Report – Figure 34 (Manson 000448)			
P-58	Photograph of Plaintiff's vehicle 1 (DEFENDANTS 000026)			
P-59	Photograph of Plaintiff's vehicle 2 (DEFENDANTS 000027)			
P-60	Photograph of Plaintiff's vehicle 3 (DEFENDANTS 000028)			
P-61	Photograph of Plaintiff's vehicle 4 (DEFENDANTS 000029)			
P-62	Photograph of Plaintiff's vehicle 5 (DEFENDANTS 000030)			
P-63	Photograph of Plaintiff's vehicle 6 (DEFENDANTS 000031)			
P-64	Photograph of Defendant's vehicle 1 (DEFENDANTS 000020)			
P-65	Photograph of Defendant's vehicle 2 (DEFENDANTS 000021)			
P-66	Photograph of Defendant's vehicle 3 (DEFENDANTS 000022)			
P-67	Photograph of Defendant's vehicle 4 (DEFENDANTS 000023)			
P-68	Photograph of Defendant's vehicle 5 (DEFENDANTS 000024)			
P-69	Photograph of Defendant's vehicle 6 (DEFENDANTS 000025)			
P-70	Photograph of Defendant's vehicle 7 (DEFENDANTS 000032)			
P-71	Photograph of Defendant's vehicle 8 (DEFENDANTS 000033)			
P-72	Defendant's Driver Qualification File (DEFENDANTS 000034-000062)			
P-73	Deposition of Bogdan Sieczkowski (B&S Owner) Dated 08/27/2022 Exhibit 3 - SAFER Web - B&S TRUCKING OF JACKSON LLC. (Manson 001378)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-74	Deposition of Bogdan Sieczkowski (B&S Owner) Dated 08/27/2022 Exhibit 8 - DQ File Checklist. (Manson 0001378)			
P-75	Deposition of Andy Sievers (Defendant's DOT Expert) Date on 12/28/2022 Exhibit 6 - 1. 382.215 Controlled substances testing. (Manson 001377)			
P-76	Deposition of Andy Sievers (Defendant's DOT Expert) Date on 12/28/2022 Exhibit 7 - 3. 40.285 When is a SAP evaluation required. (Manson 001377)			
P-77	Deposition of Andy Sievers (Defendant's DOT Expert) Date on 12/28/2022 Exhibit 9 - 49 CFR 395.8 - Drivers record of duty status. (Manson 001377)			
P-78	Deposition of Dennis R. Gutzman, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 01/23/2023 Exhibit 4 - Knee Image. (Manson 001379)			
P-79	Deposition of Dennis R. Gutzman, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 01/23/2023 Exhibit 5 - meniscus-posterior-horn. (Manson 001379)			
P-80	Deposition of Dennis R. Gutzman, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 01/23/2023 Exhibit 6 - Meniscus Tear. (Manson 001379)			
P-81	Deposition of Dennis R. Gutzman, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 01/23/2023 Exhibit 7 - Meniscus Tear Surgery.mp4 (Manson 001379 & 001384)			
P-82	Deposition of Stephen Earle, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 02/15/2023 Exhibit 7 - Cervical Surgery MP4. (Manson 001383 & 001385)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-83	Deposition of Stephen Earle, M.D. (Plaintiff's Treating Physician/ Surgeon) Date on 02/15/2023 Exhibit 8 - Lumbar TLIF surgery.mp4 (Manson 001383 & 001386)			
P-89	San Antonio Police Department-DWQ (Manson 001574-001597)			
P-90	San Antonio Police Department-DWQ (Videos & 911 Calls) (Manson 001598)			
	A1. SAPD ADAM MARTINEZ 1159 Body Cam Part 1			
	A2. SAPD ADAM MARTINEZ 1159 Body Cam Part 2			
	A3. SAPD ADAM MARTINEZ 1159 Body Cam Part 3			
	B1. SAPD OLIVERIO BORJA 1509 Body Cam Part 1			
	B2. SAPD OLIVERIO BORJA 1509 Body Cam Part 2			
	B3. SAPD OLIVERIO BORJA 1509 Body Cam Part 3			
	C1. SAPD PHILLIP ROBERT JAIMES 0302 Body Cam Part 1			
	C2. SAPD PHILLIP ROBERT JAIMES 0302 Body Cam Part 2			
	C3. SAPD PHILLIP ROBERT JAIMES 0302 Body Cam Part 3			
	C4. SAPD PHILLIP ROBERT JAIMES 0302 Body Cam Part 4			
	D1. SAPD ABRAHAM E ESQUIVEL 0690 Body Cam Part 1			
	D2. SAPD ABRAHAM E ESQUIVEL 0690 Body Cam Part 2			
	D3. SAPD ABRAHAM E ESQUIVEL 0690 Body Cam Part 3			
	D4. SAPD ABRAHAM E ESQUIVEL 0690 Body Cam Part 4			
	E1. SAPD Dash Cam 1 Part 1			
	E2. SAPD Dash Cam 1 Part 2			
	E3. SAPD Dash Cam 1 Part 3			
	F1. SAPD Dash Cam 2 Part 1			
	F2. SAPD Dash Cam 2 Part 2			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
	F3. SAPD Dash Cam 2 Part 3			
	G1. SAPD Dash Cam 3 Part 1			
	G2. SAPD Dash Cam 3 Part 2			
	G3. SAPD Dash Cam 3 Part 3			
	H1. SAPD Dash Cam 4 Part 1			
	H2. SAPD Dash Cam 4 Part 2			
	H3. SAPD Dash Cam 4 Part 3			
	H4. SAPD Dash Cam 4 Part 4			
	I. 911 Call Antoine Manson			
	J. 911 Call Witness Sean Moreau			
	K. 911 Call Witness Mari			
P-91	Deposition of Officer Adam Martinez Date on 04/14/2023 Exhibit 5 – Code sheet (Manson 001599)			
P-92	Driver Logs (9.20.2020 – 3.14.2021) – Produced by Defendants			
P-93	Driver Logs Summary (Manson 001604-001609)			
P-94	Attachment to driver log summary with highlights Driver Logs (3.14.2021 – 3.21.2021) (Manson 001610-001625)			
P-95	Attachment to driver log summary with highlights Driver Logs (9.20.2020 – 3.14.2021) (Manson 001626-002055)			
P-96	2nd Deposition of Mariel Arias-Padilla (Defendant driver) Date on 10/27/2023 Exhibit 2 Screenshot from Bodycam Video. (Manson 002056)			
P-97	2nd Deposition of Mariel Arias-Padilla (Defendant driver) Date on 10/27/2023 Exhibit 4 Body Camera Video. (Manson 002056)			
	A. Part 1			
	B. Part 2			
	C. Part 3			
	D. Part 4			
P-98	2nd Deposition of Kerry Nelson (Plaintiff's DOT Fleet Safety) Date on 11/16/2023 Exhibit 4 – 49 CFR s 395.3 Maximum driving time for property-carrying vehicles (Manson 002057)			

Ex. #	Description	Offered (Date)	Admitted (Date)	Excluded/ Not Allowed
P-99	2 nd Deposition of Kerry Nelson (Plaintiff's DOT Fleet Safety) Date on 11/16/2023 Exhibit 5 – Mariel A. Arias (Combined Driver Logs) (2.20.2021 - 3.14.2021) (Manson 002057)			

RESERVATIONS

Plaintiff reserves the right to amend or supplement this exhibit list. Plaintiff reserves the right to object to any and all exhibits on this list on the grounds of relevance, authenticity, prejudice, hearsay, and any other applicable basis. Plaintiff reserves the right to use any document whether listed or not for rebuttal.

Respectfully submitted,

The Law Offices of Thomas J. Henry

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record pursuant to the Federal Rules of Civil Procedure on November 25, 2024.

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